

**EXHIBIT 4**



**Gary Goldstein**

**From:** Gary Goldstein  
**Sent:** Wednesday, March 8, 2023 2:03 PM  
**To:** Amir Tahmassebi  
**Cc:** jason@wandnerlaw.com; Michael W. Debre; Cecilio I. Porras  
**Subject:** Re: production of documents re: Steven Ivankovich and Managed LLCs

Dear Amir:

I sent you a shared dropbox link. In that file I placed what I believe to be the most responsive documents to your letter document request. This probably provides you with more information then in your letter request but believe it will be helpful in the overall picture. You already have the explanation in Steve's deposition in aid of execution.

Included are the last filed tax returns and or K-1s for P-2 and P-5. The LLC documents, and even loan agreements. P&L for at least the five P-5 properties. To facilitate your following the ownership interests I have included structure charts for P-2 and P-5. Steve's tax returns for 2018 2019 2020 were not filed . Those returns will be filed most likely this week. When I receive copies, I will forward them to you unredacted.

These documents are being provided to you and as we agreed will be covered by the existing confidentiality agreement entered in the ZZH/Lee case.

These documents include all the Walker & Dunlop original deeds of trust and other relevant documents. ~~Large~~ you ~~mitigate the damages that the Pilgrim Texas LLCs are sustaining and immediately work out an agreed order with~~ Mike Debra ~~to release the freeze on the escrow funds held by Walker & Dunlop.~~ These properties do not cash flow. They can't pay current real estate taxes \$600,000 + repairs and improvements to get units rented and can't pay judgments entered against them so far \$170,000 going to be another \$550,000 soon.

~~The settlement portion of this email is privileged but true.~~

Very truly yours,  
Gary Goldstein, Esquire  
General Counsel Atlas Group  
Cell 561-373-0327  
111 S. Calvert St  
25th Floor  
Baltimore, MD 21201  
MD Fed. Bar # 00825